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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

3:17-cr-00425-BR

v.

JOSEPH RICHARD CARUSO,

Defendant.

**MOTION FOR SUBSTITUTION OF
21.50928069 UNITS OF BITCOIN;
60.182132298 UNITS OF BITCOIN CASH;
424.4562923599 UNITS OF ETHEREUM;
AND 0.10542074 UNITS OF LITECOIN,
NOW IN THE FORM OF \$753,356.34 U.S.
CURRENCY, *RES***

The United States of America by and through Billy J. Williams, United States Attorney for the District of Oregon and Scott M. Kerin, Assistant United States Attorney, moves this Court for an order substituting the total sum of \$753,356.34 in United States currency for the assets known as 21.50928069 units of Bitcoin; 60.182132298 units of Bitcoin cash; 424.4562923599 units of Ethereum; and 0.10542074 units of Litecoin (hereinafter, “Virtual Currency”).

On December 11, 2017, a Stipulated Order for an Interlocutory Sale was entered authorizing Homeland Security Investigations (HSI) and/or United States Customs and Border Protection, to sell the Virtual Currency and upon sale of the Virtual Currency and after all costs

have been paid, the proceeds be deposited in the United States Treasury Seized Deposit Fund and substituted for the Virtual Currency in this criminal case.

On December 14, 2017, HSI sold the Virtual Currency. After paying all costs, including processing, selling and/or exchanging this Virtual Currency, the United States of America hereby requests the net proceeds of \$753,356.34 in United States currency be substituted in all respects for the 21.50928069 units of Bitcoin; 60.182132298 units of Bitcoin cash; 424.4562923599 units of Ethereum; and 0.10542074 units of Litecoin.

Dated this 17th day of January 2018.

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

s/ Scott M. Kerin
SCOTT M. KERIN
Assistant United States Attorney